

FILED

MAR 20 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,

§ CRIMINAL NO. SA:

Plaintiff,

§ INDICTMENT

v.

DANIEL VESA,

§ [In violation of:

§ 18 U.S.C. § 2251(a)

§ Production of Child Pornography;

§ 18 U.S.C. § 2252A(a)(2)

§ Receipt of Child Pornography]

§ 18 U.S.C. § 2422(b)

§ Coercion and Enticement

Defendant.

THE GRAND JURY CHARGES:

SA 19 CR 0193 DAE

COUNT ONE

[18 U.S.C. § 2251(a)]

On or about December 28, 2018, within the Western District of Texas, the Defendant,

DANIEL VESA,

did knowingly employ, use, persuade, induce, entice and coerce, a minor, CV1, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, and which visual depiction has actually been transmitted in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

[18 U.S.C. § 2252A(a)(2)]

On or about December 28, 2018, within the Western District of Texas, and elsewhere, the Defendant,

DANIEL VESA,

did knowingly receive child pornography, as defined in Title 18, United States Code, Section

2256(8)(A), in and affecting interstate and foreign commerce, by any means, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE
[18 U.S.C. § 2422(b)]

On or about December 2018, and continuing through February 28, 2019, within the Western District of Texas, the Defendant,

DANIEL VESA,

did uses any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense,

All in violation of 18 United States Code Section 2422(b).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

Sexual Exploitation of Children Violations and Forfeiture Statutes

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to Defendant, **DANIEL VESA**, of its intent to seek the forfeiture of certain property subject to forfeiture, including but not limited to the digital and electronic devices seized by law enforcement during the investigation of this case, upon conviction and pursuant to

Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture.—A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United

States such person's interest in-

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL

[REDACTED]
FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: *Richardson*
TRACY THOMPSON
Assistant United States Attorney